UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

JOHN DILLON,)	
Plaintiff,)	
v.)	Civil Action Number 3:20-CV-00372
)	Chief Judge Waverly Crenshaw
EARLY WARNING SERVICES, LLC,)	Magistrate Judge Barbara D. Holmes
)	
Defendant.)	

JOINT CASE RESOLUTION STATUS REPORT

Plaintiff John Dillon and Defendant Early Warning Services, LLC ("EWS") (collectively, the "Parties") through their counsel and pursuant to the Court's Initial Case Management Order (Dkt. No. 27) submit the following Joint Case Resolution Status Report:

EWS served its initial disclosures along with 916 pages of documents related to Plaintiff. Plaintiff also served initial disclosures with an 82-page document production. The parties have had several discussions outlining their respective views on the merits of the Plaintiff's claim. The Plaintiff's counsel has provided these hundreds of pages to the Plaintiff and continues to have extensive conversations with the Plaintiff regarding the information contained in those documents.

Due to the fact-intensive and comprehensive nature of the documentary evidence produced thus far, the Plaintiff has not yet formulated a settlement demand in this matter. Plaintiff expects to have a detailed written settlement demand to the Defendant within fourteen days, once Plaintiff finalizes an evaluation of the case, in light of the voluminous documents produced by the Defendant

Dated: December 4, 2020

/s/ William M. Kaludis William M. Kaludis

Shield Law Group

5115 Maryland Way, Suite 911

Brentwood, TN 37027 Telephone: (615) 742-8020 Facsimile: (615) 255-6037 bill@shieldlawgroup.com

/s/ Yitzchak Zelman

Yitzchak Zelman (pro hac vice)

Marcus Zelman, LLC

701 Cookman Avenue, Suite 300

Asbury Park, NJ 07712 Telephone: (732) 695-3282

Facsimile: (732)298-6256 yzelman@marcuszelman.com

Attorneys for Plaintiff John Dillon

Respectfully submitted,

/s/ Beau C. Creson

Jason W Callen (#26225) Beau C. Creson (#32049) BUTLER SNOW, LLP

The Pinnacle at Symphony Place

150 Third Avenue, South Nashville, Tennessee 37201 jason.callen@butlersnow.com beau.creson@butlersnow.com Telephone: 615-651-6700

Facsimile: 615-651-6701

Meagan A. Mihalko (pro hac vice)

Virginia Bar No. 80703

TROUTMAN PEPPER HAMILTON

SANDERS LLP 1001 Haxall Pt.

Richmond, Virginia 23219

Telephone: 804-697-1281 Facsimile: 804-697-1339

Attorneys for Defendant Early Warning

Services, LLC

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served upon Filing Users via the electronic filing system and on other counsel via U. S. Mail, first-class postage prepaid, this December 4, 2020, on the following:

William M. Kaludis Shield Law Group 5115 Maryland Way, Suite 911 Brentwood, TN 37027

Yitzchak Zelman Marcus Zelman, LLC 701 Cookman Avenue, Suite 300 Asbury Park, NJ 07712

/s/ Beau C. Creson

56541179.v1